

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

\*\*\*\*\*  
Marc Jon Manchon, \*  
\*  
Plaintiff, \*  
v. \* **Docket No. 1:24-cv-00347-LM-AJ**  
\*  
Town of Charlestown, NH, et al. \*  
\*  
Defendants. \*  
\*\*\*\*\*

**DEFENDANTS' RESPONSE TO PLAINTIFF'S MOTION FOR JOINDER**

Defendants file this response to Plaintiff's motion seeking to join David A. Tucker as a defendant in this litigation and state as follows:

1. On March 2, 2025, Plaintiff filed a motion seeking to join David A. Tucker as a defendant in this litigation. (ECF Doc. 11.) On the same date, Plaintiff filed an amended complaint. (ECF Doc. 12.) As articulated in the court-approved discovery plan, Plaintiff's deadline to amend the pleadings and join additional parties was March 3, 2025.

2. Given the deadlines contained in the court-approved discovery plan, Defendants take no position at the present time on Plaintiff's pending motion seeking to add David A. Tucker as a defendant. With respect to the substantive elements of Plaintiff's motion directed at Defendants, Defendants continue to deny—as they have previously—Plaintiff's assertions that Defendants are liable under any theory asserted by Plaintiff for alleged damages. Moreover, Defendants continue to reserve all legal defenses available to them in the course of this proceeding, including but not limited to any arguments that Plaintiff's motion to join David A. Tucker and the amended complaint are barred, in whole or in part, by the statute of limitations.

3. Due to the brevity of this response, no memorandum of law accompanies it. See Local Rule 7.1(a)(2).

WHEREFORE Defendants respectfully request that this Court:

- A. Consider this response; and
- B. Grant such further relief that is just.

Respectfully submitted,

**Town of Charlestown, NH Police Department,  
Patrick Connors and Sirena Relihan**

By Their Attorneys,  
**Gallagher, Callahan & Gartrell, P.C.**

Dated: March 17, 2025

By: /s/ Matthew V. Burrows  
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**CERTIFICATE OF SERVICE**

I certify that a copy of this filing was served this date upon Plaintiff via the Court's electronic filing system.

Dated: March 17, 2025

By: /s/ Matthew V. Burrows  
Matthew V. Burrows, Esq.